

Landscape management and maintenance plan

The Friends of Wimbledon Park (Friends) is a voluntary umbrella organization that aims to give a voice to local people, community groups and other interested parties, to protect and enhance this well-loved heritage landscape, Heritage Wimbledon Park, for future generations. This is our third response to the Local Plan. Our response is in green.

Background

The Friends were setup in 2012 and then asked Doug Napier¹ (LBM Greenspaces Manager) for the Wimbledon Park business plan. He replied there isn't one. We then wrote the Conservation Management Plan (CMP) 2016. This identified 4 topics:

- 1) Study
- 2) Sport
- 3) Wellbeing
- 4) Community

That need to be satisfied.

A summary CMP² was written in 2021. Landscape, biodiversity, and habitat are key objectives. We identified that 56% of public park is pay to use. We also noted the lack of facilities for children 12 years and over.

We set up the Friends of Wimbledon Park Forum (FOWP Forum) within our constitution. This includes the 3 owners, residents associations, park employees, clubs, individuals, and others who wish to be involved in improving the Grade II* Heritage Park. Getting things done was and is difficult. Told that our work such as tree planting, bat surveys and projects are low priority and no funding.

Statement of Common Ground between Merton Council and Historic England -Addendum Matter 14 10/06/2022

Site Wi3: All England Lawn Tennis Club - Church Road - Allocation policy pp.289

Secure investment in the former golf course to invest in and conserve and enhance the historic landscape

Reason: As set out in our Hearing Statement, use of "reimagine" is probably a more accurate reflection of the proposed development as part of the specific planning application. We advise the language is changed to better reflect the language of the NPPF, to provide clarity (as it is not clear what "reimagine" would entail), and therefore set an effective, positive strategy for the historic environment.

The mantra here should be 'Landscape, biodiversity and habitat'. Then the question 'What are the Capabilities for People in our Heritage Park?' Participation sport has been a factor in retaining this remnant of the original Capability Brown landscape when The Wimbledon Club purchased the freehold of their 4ha section in 1899.

NPPF 190. 'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats'. This a clear statement and in this context terms like investment which suggests commercial interest and reimagine which suggest changes to the heritage asset will diminish conservation and heritage value and need to be avoided. Enjoyment of the historic environment is very important and visitor access should be maintained and not restricted.

Development proposal must respect the site's historic setting including the views to St Mary's Church and the surrounding area and the views from the Grade II* listed Wimbledon Park, and those identified in the Wimbledon North Conservation Area Appraisal.

Reason: to clarify what heritage assets need to be considered, and to improve a positive strategy for the conservation of the historic environment.

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A piecemeal approach to structures has led to obscured vistas. Examples are the 5 blots around the lakeside landscape³. These are the Watersports building, the boat store, the green sports hall, the 6 monthly tennis dome and the AELTC Greenspaces compound.

- The view to St Mary's Church is spoilt by these blots.
 The blots need relocating.
- 3) Other vistas need to be identified and repaired.

Removing these blots on the lakeside landscape should be a priority.

The Wimbledon Park Registered Park and Garden was added to Historic England's Heritage At Risk Register due to the following issues: 'Uncertainty around the future [of the entire historic landscape]: 'The impacts of divided ownership on landscape management: - Obscured views: and 'The deterioration of the Lake

Reason: to better comply with NPPF 190 and to set a positive strategy for heritage.

A fourth owner has been identified. TfL own the area under Revelstoke Road Bridge an entrance to Wimbledon Park. Many describe this as a prison like entrance which is why the Friends sought and obtained planning permission to improve this entrance.

HE Comment on the application: "Given the above, Historic England broadly welcomes the proposed development. The resulting reduction in the heavy and utilitarian appearance of the Revelstoke Road entrance and car park would improve the visual amenity and character of the part of the registered park and garden and the conservation areas affected as well as the immediate setting on the approach along Revelstoke Road. It would also help to address issues contributing to the Registered landscape's inclusion on the Heritage at Risk Register"

Entrances are particularly important as visitors should receive an uplift on entering the heritage site and vistas should be part of this uplift. Revelstoke Road entrance is the worst of the five entrances.

The above is an example of what can be done. It is easy for organisations and groups to take a 'silo' approach concentrating on improving their own facilities without due regard for others. The FOWP Forum helps to overcome this tendency.

Secure the production of a landscape management and maintenance plan as part of any development proposals that may come forward, to provide a comprehensive plan for the conservation, enhancement and ongoing management of the entire registered park and garden that takes full account of the site's historic development and significance, acting as a common agreed baseline for all parties to work from.

Reason: to better comply with NPPF 190 and to set a positive strategy for heritage, and to address specific reason behind the site's HAR status.

There are several documents that have been helpful to the Friends. These include:

- 1) Covenant 23rd December 1993.
- The Glasspoole Thomson Report 1998⁴. 2)
- 3) Trace metal contamination of lakes and ponds in London. PhD thesis, Charlotte Jane Hall. 2013.
- Friends of Wimbledon Park Conservation Management Plan (2016) and the Summary 2021. 4)
- Sport in The Grade II* Heritage Landscape known as Wimbledon Park 2016. 5)
- Capability Brown's Wimbledon Park a History: Dave Dawson 2016 6)
- Blue plaques 13th August 2016. 7)
- Bat emergence and activity surveys 2017. 8)
- LBM Masterplan⁵ 2018.
- 10) In addition, the Friends together with The Capability Brown Society (TCBS) have produced the Vision for the 61ha park and suggest a phased approach to improvements that preserves the necessary holistic approach to conserving this heritage asset. The objective was to improve habitats for nature and maximize the enjoyment of the park for all visitors. In many cases supported by plan drawings and explanations.

Our CMP has guided our activities and our work includes finding funding, implementing, and maintaining with volunteer help:

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- 1) planting over 2000 trees which include hornbeam replacements for the slowly dying black poplars along the eastern perimeter path.
- 2) with Dave Dawson's help drawing up the management plan for Horse Close Wood.
- 3) carrying out a bat survey in the 61ha park
- 4) fixing blue plaques at each of the five entrances in 2016 in recognition of Capability Brown's tercentenary.
- 5) liaising with Thames Water, Environmental Agency and South East Rivers Trust in 2017 to reduce pollution and fish kills. We identified to the 3 owners that silt traps would be a useful investment to reduce silting in the lake.
- 6) drawing up plans for the Stadium Arena.
- 7) obtaining planning permission for the Revelstoke Road entrance improvements.
- 8) providing a free to use table tennis table (another in store under café awaiting siting agreement).
- 9) fencing in the veteran tree by the Old Bowling Green with the help of the Community Payback Team (CPT).
- 10) working with The Capability Brown Society (TCBS) to provide a platform for schools to show and demonstrate their students' abilities in arts and music.

We say that this is a good way to better comply with NPPF 190.

190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place

Vistas are a very important part of landscaping and that provided by Capability Brown here is of national standard. They have been neglected and need restoration.

Grade II* Heritage Wimbledon Park (61ha) is shared between 4 owners AELTC, The Wimbledon Club (TWC) LB Merton (LBM) and TfL⁶. It needs a holistic approach to improvements particularly as it is on Historic England's 'At Risk Register'. A joint agreement on retaining and improving vistas and a biodiversity strategy are two examples of what could be achieved.

The recent LBM Masterplan content should form part of the Local Plan. Other documents listed above should also be considered.

Issue (i): Is Site Allocation Wi3 justified, effective consistent with national policy, and in general conformity with the London Plan?

Questions:

- 1. Is the Council's updated heritage evidence base relating to the Wi3 Allocation proportionate, and does it justify the approach taken including in terms of any suggested MMs?
 - a. Wimbledon Park is a landscape asset with the lake a central feature. This is a blue green feature and important for wellbeing as well as nature. Participation sport is a major part of visitor enjoyment. However, it is walking that is the most important activity and paths are poor when they should be of a national standard. For example, this could be rectified by a public lakeside walk within a nature reserve and the public path continuing through to Church Road.
 - b. The Council's approach is not justified.
- 2. Would any suggested MMs provide a positive strategy for the conservation and enjoyment of the Registered Park, and provide an effective basis for measures to address the reasons for its inclusion on Historic England's Heritage at Risk register (per paragraph 190 of the Framework)?
 - a. A holistic approach to 'What Matters and Why' would be of enormous benefit and enable examination of getting the balance right between landscapes, nature and visitor needs.

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- 3. Is an updated Statement of Common Ground with Historic England available which covers the above points?
 - a. The suggestion in D above is a good starting point but fails to emphasize the importance of community input and the needs of the community.
- 4. Would suggested MMs ensure that the allocation is grounded in an understanding and evaluation of the defining characteristics of the Wi3 site and its surroundings (per paragraph 127 of the Framework)?
 - a. Until the end of December 2021, the whole 61ha park was available on a pay to use basis apart from about 44% of the public park which is free to use. The activity provided was participation sports. Wi3 is a development site for spectator sport, and this is a change of use that is inappropriate.
- 5. Would any suggested MMs ensure that the approach to Metropolitan Open Land (MOL) is justified, and do they provide an effective basis for development management across the Wi3 site in these regards?
 - a. No, the management of Heritage Wimbledon Park should be confined to the park and not partly linked with a development site nearby. It is about conserving the heritage and remedying the reasons why it is on the 'At Risk Register' in a sensible way.
- 6. Taking together the presence of restrictive covenants relating to part of the Wi3 site with recent case law referred to in previous hearing statements is the allocation effective insofar as its deliverability (or developability) over the plan period is concerned (per paragraph 35(d) of the Framework)?
 - a. No, the covenant should be adhered to.

Conclusion

The evidence shows a failure to understand the need to use a holistic approach that focuses on the reasons why it is a heritage site on the 'At Risk Register'. The plan should include significant benefits for the community carefully balanced with the restoration of landscapes, improvements to biodiversity and habitats. This requires the owners to work together with community involvement. This means the Plan submitted is unsound and a way forward has been described in this response.

This 61ha park is the remnant of the 374ha original landscape. Much has been lost! This generation needs to consider what our descendants in 150 years' time will say? Will they raise a glass and toast their forbears (us) with 'thank you for preserving Capability Browns Heritage Wimbledon Park?'

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¹ Since retired

² <u>(friendsofwimbledonpark.org)</u>

³ LBM Wimbledon Park & Lake Masterplan page 28 says: 2.8.6. St Mary's Church forms a prominent eye catcher, as does Centre Court at the All England Lawn Tennis Club. Lakeside structures at The Wimbledon Club heavily influence the view, and detract from the soft green character of the adjacent golf course (refer to View 3, shown on page 29, 30 & 31).

⁴ Glasspoole-Thomson-03-98.pdf (friendsofwimbledonpark.org) a report commissioned by LBM

 $^{^{5} \ \}underline{\text{https://www.merton.gov.uk/leisure-recreation-and-culture/parks-and-open-spaces/parks-and-recreation-grounds/wimbledon-park/wimbledon-park-master-plan}$

⁶ TfL own the land under Revelstoke Road railway bridge which is very important for the entry to the park.